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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

Capitol Complex
333 W. Nye Lane
Carson City, Nevada 89710

December 28, 1992

Mr. James Currivan
District Manager
Bureau of Land Management
Battle Mountain District Office
P.O. Box 1420
Battle Mountain, Nevada 89820

Dear Mr. Currivan:

I am in receipt of your letter of December 17, 1992 concerning the Antelope Valley Pesticide Dump, Lander County Nevada. Accompanying this letter were pictures taken September 18, 1992 of HAZCAT activities at the facility.

I have discussed the closure of the pesticide dump with Dave Emme of the NDEPs Solid Waste Branch. Mr. Emme is in concurrence with the closure requirements previously outlined.

The clay cap should be at least 12 inches thick and have a permeability of not less than 1×10^{-6} cm/s. Testing of permeability can be conducted by engineering or geotechnical firms using methods established by ASTM.

The use of existing downgradient wells for monitoring purposes may be acceptable provided the wells are in reasonable proximity to the facility and the construction details are consistent with those of a monitoring well given the nature of the subsurface geology and aquifer characteristics and the physical migration characteristics of the compounds of concern. The current use of the wells will also have a bearing on their applicability for monitoring purposes. Please feel free to submit this information to our office and we will make a determination on the appropriateness of the use of these wells in this situation.

The analytical parameters for ground water testing should be selected based upon the expected contaminants from the dump. For example, EPA Method 608 would be applicable for pesticides and PCB's organochlorine, Method 614 for organophosphate pesticides, Method 617

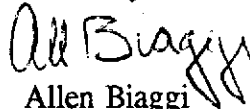
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for organohalide pesticides and PCB's, Method 619 for triazine pesticides, Method 630 for dithiocarbamate pesticides or Method 632 for carbamates and urea pesticides. The Division and your analytical laboratory can assist you with the selection of the proper analytical methodology. Discussions with the individuals who used the facility in the past and are currently using the dump would also be appropriate to determine the types of chemicals or residues potentially disposed of in the dump.

The Division does not have the resources to conduct ground water sampling for the BLM. This is typically conducted by the responsible parties, in this case the land owner (BLM), the lessee (Lander County) and, if necessary, the past and present users of the facility. The Division will be happy to provide technical expertise as needed.

If questions or comments arise, please feel free to contact me.

Sincerely,



Allen Biaggi
Branch Supervisor
Site Assessment/Corrective Action
Bureau of Chemical Hazards Management

AJB:hml

cc: Jolaine Johnson, NDEP

✓ Dave Emme, NDEP

Sue Skinner, BLM, State Office, Reno